

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

DANIEL CORTES ARIAS, an individual,

Plaintiff,

v.

TRAVELERS CASUALTY INSURANCE  
COMPANY OF AMERICA, a foreign  
insurance company,

Defendant.

CASE NO. 2:24-cv-00546-JHC

ORDER

Before the Court is the parties' proposed Stipulated Protective Order. Dkt. # 21.

Local Rule LCR 26(c)(2) provides that "[p]arties that wish to depart from [this district's] model [protective] order must provide the court with a redlined version identifying departures from the model." The parties' proposed protective order departs from the model, but the parties' failed to provide a redlined version. *See generally* Dkt.; Dkt. # 22.

The Court ordered the parties to file a redlined version of the protective order by December 16, 2024, Dkt. # 22, but the parties failed to do so. *See generally* Dkt.

Without the benefit of a redlined version, the Court briefly reviewed the proposed order and finds it deficient in at least one significant respect: It provides:

1 “Confidential” material shall collectively refer to Travelers confidential,  
2 proprietary, and/or trade secret information.

3 This is overly broad. The model order says, “The parties must include a list of specific  
4 documents such as ‘company’s customer list’ or ‘plaintiff’s medical records;’ do not list broad  
5 categories of documents such as ‘sensitive business material.’” The proposed order may be  
6 deficient in other respects.

7 The Court therefore DENIES the parties’ request without prejudice.

8 Dated this 17th day of December, 2024.

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11 John H. Chun  
12 United States District Judge  
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